For EPA Use Only CUE 02 0054
ID#

Worksheet 6. Application Summary

This worksheet will be posted on the web to notify the public of requests for critical use exemptions beyond the 2005 phase out for methyl bromide. Therefore, this worksheet cannot be claimed as CBI.

1. **Name of Applicant:** Florida Fruit and Vegetable Association
2. **Location:** Florida
3. **Crop:** Peppers
4. **Pounds of Methyl Bromide Requested** 2005 3,024,000
5. **Area Treated with Methyl Bromide** 2005 21,600 acres **units**
6. **If methyl bromide is requested for additional years, reason for request:**

No assurance that issues associated with potential alternatives will be resolved.

2006 3,024,000 **lbs.** **Area Treated** 21,600 acres **units**

2007 3,024,000 **lbs.** **Area Treated** 21,600 acres **units**

Place an "X" in the column(s) labeled "Not Technically Feasible" and/or "Not Economically Feasible" where appropriate. Use the "Reasons" column to describe why the potential alternative is not feasible.

Potential Alternatives	Not Technically Feasible	Not Economically Feasible	Reasons
1,3- Dichloropropene	X		Only provides control of Nematodes, must be used in combination with other materials, labeling issues limits its utility in existing cropping systems. In addition, 1,3-D is NOT labeled for use in certain pepper producing areas of Florida, such as Dade County.
1,3-Dichloropropene, Chloropicrin	X		Better treatment but needs an appropriate herbicide partner that gives season long control (6 - 9 months). Application technology and use rates still need refinement. Proposed labeling to deal with PPE requirements, buffer zones and "karst geology" have been proposed but not yet approved that could make this alternative more feasible. In addition, 1,3-D is NOT labeled for use in certain pepper producing areas of Florida, such as Dade County.
Chloropicrin	X		Does not provide a spectrum of control that would make it a drop in replacement -- needs to be partnered with other materials.
Metam Sodium	X		Limited utility due to soil characteristics and wetting pattern under plastic mulch. Partial efficacy for major pests. To get equivalent efficacy must be partnered with other compounds and production system would have to be totally revised (multiple drip tubes to provide adequate wetting -- not economically feasible)
Metam Sodium & Crop Rotation	X		See above; crop rotations with fallow period crops to reduce pest pressure is currently the industry standard practice. Multiple cropping systems have been trialed with only incremental efficacy.
Solarization, Fungicides	X		Climatic conditions during the fallow period preclude solarization as a reliable and consistent alternative.
Non- Chemical Alternative	X	X	See narrative in CUE. All of the proposed non chemical alternatives that have been proposed for peppers have been examined for adequacy in a methyl bromide replacement program. While some show marginal increases in control for a specific pest, they do not represent stand alone replacement strategies. Where appropriate these practices have been incorporated into current production practices to minimize the need for chemical pest control.

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1. **Name of Applicant:** Florida Fruit and Vegetable Association
2. **Location:** Florida
3. **Crop:** Eggplant
4. **Pounds of Methyl Bromide Requested** 2005 252,000
5. **Area Treated with Methyl Bromide** 2005 1,800 acres **units**
6. **If methyl bromide is requested for additional years, reason for request:**

No assurance that issues associated with potential alternatives will be resolved.

2006 252,000 lbs. Area Treated 1,800 acres **units**

2007 252,000 lbs. Area Treated 1,800 acres **units**

Place an "X" in the column(s) labeled "Not Technically Feasible" and/or "Not Economically Feasible" where appropriate. Use the "Reasons" column to describe why the potential alternative is not feasible.

Potential Alternatives	Not Technically Feasible	Not Economically Feasible	Reasons
1,3- Dichloropropene	X		Only provides control of Nematodes, must be used in combination with other materials, labeling issues limits its utility in existing cropping systems. In addition, 1,3-D is NOT labeled for use in certain eggplant producing areas of Florida. such as Dade County.
1,3-Dichloropropene, Chloropicrin	X		Better treatment but needs an appropriate herbicide partner that gives season long control (6 - 9 months). Application technology and use rates still need refinement. Proposed labeling to deal with PPE requirements, buffer zones and "karst geology" have been proposed but not yet approved that could make this alternative more feasible. In addition, 1,3-D is NOT labeled for use in certain eggplant producing areas of Florida, such as Dade County.
Chloropicrin	X		Does not provide a spectrum of control that would make it a drop in replacement – needs to be partnered with other materials.
Metam Sodium	X		Limited utility due to soil characteristics and wetting pattern under plastic mulch. Partial efficacy for major pests. To get equivalent efficacy must be partnered with other compounds and production system would have to be totally revised (multiple drip tubes to provide adequate wetting – not economically feasible).
Metam Sodium & Crop Rotation	X		See above; crop rotations with fallow period crops to reduce pest pressure is currently the industry standard practice. Multiple cropping systems have been trialed with only incremental efficacy.
Solarization, Fungicides	X		Climatic conditions during the fallow period preclude solarization as a reliable and consistent alternative.
Non- Chemical Alternative	X	X	See narrative in CUE. All of the proposed non chemical alternatives that have been proposed for eggplants have been examined for adequacy in a methyl bromide replacement program. While some show marginal increases in control for a specific pest they do not represent stand alone replacement strategies. Where appropriate these practices have been incorporated into current production practices to minimize the need for chemical pest control.